

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

SAMUEL TURNER POOLE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 99-635-SLR
	)	
STAN TAYLOR, and	)	
RAPHAEL WILLIAMS,	)	
	)	
Defendants.	)	

**DEFENDANTS' 1<sup>st</sup> SUPPLEMENT TO THEIR REVISED RESPONSE TO  
PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants hereby supplement their revised response to *Plaintiff's Request for Production of Documents*<sup>1</sup> as follows:

5. All medical records containing to the July 6, 1999 incident report filed by everybody and even Medical Staff and Guards.

**RESPONSE:** Please refer to medical records at D00411-00454. A search continues for the incident report and, if it exists, it will be produced. Defendants supplement this response with the attached documents that are the logbook pages 259-264 for Pod 2L-M for July 6, 1999.

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<sup>1</sup> Each Interrogatory is entered as presented to the Defendants by the Plaintiff in its entirety. The defendants has not altered the sentence structure or made grammatical or spelling corrections.

STATE OF DELAWARE  
DEPARTMENT OF JUSTICE

/s/ Marc P. Niedzielski

Marc P. Niedzielski, I.D. # 2616

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(302) 577-8400

Attorneys for Defendants

DATED: July 31, 2006

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Plaintiff,	)	
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Defendants.	)	

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the date indicated, he caused the attached Defendants' 1<sup>st</sup> Supplement to Their Revised Response to Plaintiff's Request for Production with the attached documents to be served by U.S. mail on the following individual:

Samuel Turner Poole  
BN 5599  
SCI Huntingdon  
1100 Pike Street  
Huntingdon, PA 16654-1112

/s/ Marc P. Niedzielski  
Marc P. Niedzielski  
Deputy Attorney General  
820 N. French Street, 6<sup>th</sup> Floor  
Wilmington, DE 19801  
(302) 577-8400

DATED: July 31, 2006